

Andrew,

Please see below several comments regarding draft#1

1) Manufacturers of photoluminescent and tritium exits will maintain that no additional lighting is required to "charge" their product, and that this

qualification is not needed. Our contention is that the best case illumination levels provided by these products does not provide sufficient illumination

for safe egress and that these products should not be combined with, or associated with the Energy Star qualification program.

2) Section 3a: "Luminance Depreciation" indicates a requirement stating that the associated product will experience light output depreciation, and

that the product should be replaced at regular intervals. We would suggest that Energy Star requirements would demand that all qualifying products

maintain or exceed "average luminance levels" for the entire warranty period at a minimum. Chloride Systems products are engineered and designed

to pass original UL 924 luminance requirements well past our normal warranty period. Many products on the market today are utilizing power supplies

that drive the led circuit well past normal operating limits in order to pass UL luminance requirements. This practice will most certainly lead to a rapid

depreciation of the led light output available for normal operation.

I will forward other comments from our staff as we further evaluate the 1st draft. Please call if you wish to discuss any of our comments.

Regards,

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